

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IRENE POLITIS,

Plaintiff,

v.

THE TRUSTEES OF COLUMBIA  
UNIVERSITY IN THE CITY OF NEW  
YORK AND THOMAS HARFORD,

Defendants.

Civil Action No. 1:18-cv-07831-PAC

Oral Argument Requested

**DEFENDANT THOMAS HARFORD’S NOTICE OF MOTIONS  
TO DISMISS COUNTS I, X, AND XI UNDER RULE 12(B)(6),  
TO STRIKE UNDER RULE 12(F), AND  
FOR AN ENLARGMENT OF TIME TO ANSWER**

**PLEASE TAKE NOTICE** that, upon: (1) Plaintiff’s Amended Complaint (“FAC”) (ECF 23) and (2) Defendant Thomas Harford’s Memorandum of Law in Support of His Motion to Dismiss Counts I, X, and XI Under Rule 12(b)(6), to Strike Under Rule 12(f), and For an Enlargement of Time to Answer, and all pleadings and papers on file in this matter, and upon such other and further oral or documentary evidence as may be presented to the Court at or prior to a hearing on this Motion, Defendant Thomas Harford will move this Court, before the Honorable Paul A. Crotty, United States District Judge, in the United States Courthouse located at 500 Pearl Street, Courtroom 14-C, New York, NY 10007, on a date to be set by the Court, for an Order pursuant to Rules 12(b)(6) and 12(f) of the Federal Rules of Civil Procedure: (i) dismissing Counts I, X, and XI in the FAC for failure to state a claim on which relief may be granted; (ii) striking Plaintiff’s damages demand for \$60 million; and (iii) for an enlargement of time to answer the remaining claims in the FAC, and for such other and further relief as the Court may deem just and

proper. This Motion is made following Mr. Harford's letter motion (ECF 30), and the Court's Minute Order of January 31, 2019.

Dated: New York, New York  
February 12, 2019

Respectfully submitted,

By: /s/ Amy Walsh  
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